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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JEANNIE ATIENZA, individually and as
successor-in-interest to Decedent
LAUDEMER ARBOLEDA,

Plaintiff,

v.

ANDREW HALL, individually and in his
capacity as a City of Danville Police
Officer; and DOES 1-50 inclusive,

Defendants.

No. C19-03440 RS

DECLARATION OF D. CAMERON BAKER
IN SUPPORT OF ANDREW HALL'S
MOTION FOR SUMMARY JUDGMENT

Date: July 15, 2021
Time: 1:30 p.m.
Crtrm: 3, 17th Floor
Judge: Hon. Richard Seeborg, Presiding
Date Action Filed: June 17, 2019
Trial Date: December 6, 2021

I, D. Cameron Baker, declare,

1. I am employed by the Contra Costa County ("County") as a Deputy County Counsel, and am one of the attorneys for defendant in this action. I am admitted to the State Bar of California and to the bar of this court. I make this declaration from personal knowledge.

2. Attached hereto as Exhibit A is a true and correct copy of the report prepared by Jason Alexander, an expert on behalf of defendant Andrew Hall, previously produced and served on Plaintiff Jeannie Atienza's counsel.

3. Attached hereto as Exhibit B are true and correct copies of excerpts from the

1 Deposition of Nicholas Muller taken in this action.

2 4. Attached hereto as Exhibit C is true and correct copy of the transcript from
3 Coroner's Inquest re death of Laudemer Arboleda.

4 5. Attached hereto as Exhibit D are true and correct copies of excerpts from the
5 Deposition of Andrew Hall taken in this action.

6 6. Attached as Exhibit E is a true and correct copy of a still image from the video
7 generated by Andrew Hall's Body Worn Camera, which image has a time stamp of 3.003
8 seconds.

9 7. Attached hereto as Exhibit F are true and correct copies of excerpts from the
10 transcript of the deposition of Chris Martin taken in this matter.

11 8. Attached hereto as Exhibit G is a true and correct copy of a still image from the
12 video generated by Andrew Hall's Body Worn Camera, which image has a time stamp of
13 3.971 seconds.

14 9. Attached hereto as Exhibit H is a true and correct copy of a still image from the
15 video generated by the forward dash camera of Deputy Muller's patrol vehicle.

16 10. Attached hereto as Exhibit I is a true and correct copy of a still image from the
17 video generated by Andrew Hall's Body Worn Camera, which image has a time stamp of
18 5.072 seconds.

19 11. Attached hereto as Exhibit J is a true and correct copy of the Forensic Services
20 Report pertaining to the incident giving rise to this matter.

21 12. Attached hereto as Exhibit K is a true and correct copy of a still image of
22 Arboleda's Honda Civic taken after the incident.

23 13. Attached hereto as Exhibit L is a true and correct copy of the Forensic Pathologist's
24 Report prepared by Dr. Arnold Josselson.

25 14. Attached hereto as Exhibit M are true and correct copies of excerpts from the
26 transcript of the deposition of Dr. Arnold Josselson in this matter.

27 15. Attached hereto as Exhibit N is a true and correct copy of the transcript of the
28

1 interview of Andrew Hall on November 3, 2018.

2 16. Attached hereto as Exhibit O is a true and correct copy of Amended Responses to
3 Special Interrogatories, Set One, to Plaintiff Jeannie Atienza.

4 17. Attached hereto as Exhibit P is a true and correct copy of the report prepared by
5 Robert Fonzi, an expert on behalf of defendant Andrew Hall, previously produced and served
6 on Plaintiff Jeannie Atienza's counsel.

7 18. Attached hereto as Exhibit Q are true and correct copies of excerpts from the
8 transcript of the deposition of Roger Clark in this matter.

9 19. Attached hereto as Exhibit R are true and correct copies of excerpts from the POST
10 Learning Domain ("LD") 22 used as an exhibit at deposition of Roger Clark.

11 20. Attached hereto as Exhibit S are true and correct copies of excerpts from the POST
12 Learning Domain ("LD") 21 used as an exhibit at deposition of Roger Clark.

13 I declare under penalty of perjury under the laws of the United States and the State
14 of California that the foregoing is true and correct, and that this declaration is executed on the
15 date indicated below at Martinez, California.

16
17 DATE: June 3, 2021


D. CAMERON BAKER